

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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LOCAL 1180, COMMUNICATIONS WORKERS OF  
AMERICA AFL-CIO, Individually and on behalf of its  
members, LOURDES ACEVEDO, NATHIA BELTRAN,  
ADRIENNE REED, JO ANN RICHARDS, ROSEANN  
SCHEMBRI, on behalf of themselves and all other  
similarly-situated individuals,

**NOTICE OF REMOVAL**

Plaintiffs,

Case No. 17 Civ. 3048

-against-

THE CITY OF NEW YORK, and DEPARTMENT OF  
CITYWIDE ADMINISTRATIVE SERVICES,

Defendants.

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**TO: THE UNITED STATES DISTRICT COURT,  
SOUTHERN DISTRICT OF NEW YORK**

Defendants City of New York, and the Department of Citywide Administrative  
Services, by their attorney, Zachary W. Carter, Corporation Counsel of the City of New York,  
respectfully move this Court as follows:

1. On April 4, 2017, the Defendants were served with a Summons and  
Complaint in *Local 1180, et al. v. City of New York, et al.*, pending in the Supreme Court of the  
State of New York, County of New York, Index No. 160513/2016. A copy of the Summons and  
Complaint, dated December 14, 2016, is annexed hereto as Exhibit A.

2. The above-captioned matter is a civil action of which the District Court  
has original jurisdiction pursuant Title VII of the Civil Rights Act of 1964 ("Title VII"), as  
amended, 42 U.S.C. § 2000e, et seq., the Equal Pay Act of 1963 ("EPA"), as amended 42 U.S.C.  
§ 206 et seq., Section 1981 of the Civil Rights Act, 42 U.S.C. § 1981 ("§1981"), et seq., and  
Section 1983 of the Civil Rights Act, 42 U.S.C. § 1983 ("§ 1983"), et seq.

3. Plaintiffs bring this lawsuit claiming, *inter alia*, that the Defendants' acts constituted sex, gender, and race discrimination in violation of the above referenced statutes. *See* Exhibit A.

4. This action is therefore removable to the District Court without regard to the citizenship or residence of the parties, pursuant to 28 U.S.C. § 1441(b).

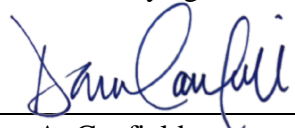
5. This Notice of Removal is timely because it is being filed within 30 days of receipt of the Summons and Complaint. *See* 28 U.S.C. § 1446(b).

6. Defendants will promptly file a copy of this Notice of Removal with the Clerk of the state court in which the action is pending.

**WHEREFORE** the Defendants respectfully request that the above-captioned action be removed from the Supreme Court of the State of New York, County of New York, to the United States District Court for the Southern District of New York.

Dated: New York, New York  
April 26, 2017

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